

LATHAM & WATKINS LLP
Marvin S. Putnam (Bar No. 212839)
marvin.putnam@lw.com
Laura R. Washington (Bar No. 266775)
laura.washington@lw.com
10250 Constellation Blvd., Suite 1100
Los Angeles, California 90067
Telephone: +1.424.653.5500
Facsimile: +1.424.653.5501

Attorneys for Defendants
Netflix, Inc., and Netflix Worldwide
Entertainment, LLC

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

FIONA HARVEY,

Plaintiff,

v.

NETFLIX, INC., and NETFLIX
WORLDWIDE ENTERTAINMENT,
LLC,

Defendants.

|Case No. 2:24-cv-04744-RGK-AJR

**[PROPOSED] ORDER GRANTING
DEFENDANTS NETFLIX, INC. AND
NETFLIX WORLDWIDE
ENTERTAINMENT, LLC'S
REQUEST FOR JUDICIAL NOTICE
IN SUPPORT OF ANTI-SLAPP
MOTION TO STRIKE**

Date: September 3, 2024
Time: 9:00 a.m.
Place: Courtroom 850

Hon. R. Gary Klausner

1 [PROPOSED] ORDER

2 Based on defendants Netflix, Inc. and Netflix Worldwide Entertainment,
3 LLC's Request for Judicial Notice in Support of Anti-SLAPP Motion to Strike the
4 Complaint filed by plaintiff Fiona Harvey, and for good cause appearing for the
5 entry thereof, IT IS HEREBY ORDERED that the Court will take judicial notice
6 of:

- 7 1. **Exhibit A:** Harvey's interview on *Piers Morgan Uncensored* dated
8 May 9, 2024;
- 9 2. **Exhibit B:** the article titled "Richard Gadd wins The Stage
10 Edinburgh Award 2019" (*Oxford Drama*, August 24, 2019;
11 <https://oxforddrama.ac.uk/news/richard-gadd-wins-the-stage-edinburgh-award-2019/>, last accessed July 23, 2024);
- 12 3. **Exhibit C:** the article titled "Richard Gadd on his stalker: 'It would
13 be unfair to say she was awful and I'm a victim'" (Logan, Brian; *The
14 Guardian*, September 10, 2019;
15 <https://www.theguardian.com/stage/2019/sep/10/richard-gadd-stalker-baby-reindeer>, last accessed July 23, 2024);
- 16 4. **Exhibit D:** the article titled "Baby Reindeer review: Searingly
17 personal work from Richard Gadd feels like a radical gesture"
18 (Thompson, Jessie; *The Standard*, October 14, 2019;
19 <https://www.standard.co.uk/culture/theatre/baby-reindeer-review-searingly-personal-work-from-richard-gadd-feels-like-a-radical-gesture-a4260691.html>, last accessed July 23, 2024);
- 20 5. **Exhibit E:** the article titled "Baby Reindeer (Bush Theatre)" (*Lou
21 Reviews*, October 17, 2019; <https://loureviews.blog/2019/10/17/baby-reindeer-bush-theatre/>, last accessed July 23, 2024);
- 22 6. **Exhibit F:** the article titled "Richard Gadd wins an Olivier Award"
23 (*Chortle*, October 26, 2020);

1 https://www.chortle.co.uk/news/2020/10/26/47175/richard_gadd_wins_an_olivier_award, last accessed July 23, 2024);

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- 3 7. **Exhibit G:** the article titled “Richard Gadd’s Baby Reindeer to be
4 adapted into Netflix Series” (Wood, Alex; *What’s On Stage*,
5 December 13, 2020; https://www.whatsonstage.com/news/richard-gadds-baby-reindeer-to-be-adapted-into-netflix-series_53015/, last
6 accessed July 23, 2024);
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- 8 8. **Exhibit H:** the article titled “Netflix Trailer for ‘Baby Reindeer’
9 Awkward Stalker Dark Comedy Series” (Billington, Alex; *First
10 Showing*, March 22, 2024; <https://www.firstshowing.net/2024/netflix-trailer-for-baby-reindeer-awkward-stalker-dark-comedy-series/>; last
11 accessed July 28, 2024);
12
- 13 9. **Exhibit I:** the article titled “Netflix’s ‘Baby Reindeer’ review: One
14 of the most brilliant and upsetting shows of 2024” (Hayson, Sam;
15 *Mashable*, April 16, 2024; <https://mashable.com/article/netflix-baby-reindeer-review#:~:text=Baby%20Reindeer%20is%20often%20hard,is%20painful%2C%20for%20multiple%20reasons>, last accessed July 23,
16 2024);
17
- 18 10. **Exhibit J:** the article titled “Netflix’s ‘Baby Reindeer’ Is a Brilliant
19 and Jarring Account of Stalking, Victimization and Emotional
20 Turmoil: TV Review” (Tinubu, Aramide; *Variety*, April 18, 2024;
21 <https://variety.com/2024/tv/reviews/baby-reindeer-review-richard-gadd-1235975310/>, last accessed July 23, 2024);
22
- 23 11. **Exhibit K:** the article titled “Is Netflix’s ‘Baby Reindeer’ Set To
24 Stampede The Emmy Awards” (Lago, Giovanni; *Next Big Picture*,
25 May 9, 2024; https://nextbestpicture.com/is-netflixs-baby-reindeer-set-to-stampede-the-emmy-awards/#google_vignette, last accessed
26
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July 23, 2024);

- 2 12. **Exhibit L:** the article titled “Baby Reindeer Begins a Journey to
3 Emmys Gold at Gotham TV Awards” (Walsh, Savannah; *Vanity Fair*,
4 June 5, 2024; <https://www.vanityfair.com/hollywood/story/baby-reindeer-begins-a-journey-to-emmys-gold-at-gotham-tv-awards#:~:text=Baby%20Reindeer%20Begins%20a%20Journey,Smit>
5 h%20and%20Colin%20From%20Accounts

6), last accessed July 23,
7 2024);
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9 13. **Exhibit M:** the article titled “MP wife’s stalker; lawyer Laura tells of
10 fired trainee’s hate campaign” (McPherson, Lynn; *Sunday Mail*,
11 January 30, 2000;
12 <https://www.thefreelibrary.com/MP+WIFE%27S+STALKER%3B+Lawyer+Laura+tells+of+fired+trainee%27s+hate...-a061570268>, last
13 accessed July 23, 2024);
14
15 14. **Exhibit N:** the article titled “I’VE GOT A LONG WRRAY TO GO
16 YET; MP Jimmy Wray talks for the first time about his stroke, his
17 family and the condition that blights his littleboy’s progress” (Brown,
18 Annie; *Daily Record*, March 3, 2004;
19 <https://www.thefreelibrary.com/I%27VE+GOT+A+LONG+WRRAY+TO+GO+YET%3B+MP+Jimmy+talks+for+the+first+time...-a0113836577>, last accessed July 23, 2024);
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21 15. **Exhibit O:** the article titled “‘Real-life’ Baby Reindeer stalking
22 Fiona Harvey was on police watchlist over ‘sinister’ campaign against
23 Sir Keir Starmer” (Sullivan, Mike; *The Sun*, May 20, 2024;
24 <https://www.thesun.co.uk/news/28035155/fiona-harvey-police-watchlist-keir-starmer-emails/>, last accessed July 23, 2024);
25
26 16. **Exhibit P:** the article titled “‘Baby Reindeer’ Creator Richard Gadd
27 Asks Fans to Stop Speculating on Show’s Real-Life Characters”
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1 (Gardner, Chris; *The Hollywood Reporter*, April 23, 2024;
2 <https://www.hollywoodreporter.com/tv/tv-news/baby-reindeer->
3 creator-netflix-real-life-chracters-donny-martha-identity-
4 1235879776/, last accessed July 28, 2024);

- 5 17. **Exhibit Q:** the article titled “Baby Reindeer fans float theory that
6 Richard Gadd’s stalker ‘Martha Scott’ might have been a man in real
7 life – as they point out all the clues in the hit Netflix series” (Taylor,
8 Jessica; *MailOnline*, April 23, 2024;
9 <https://www.dailymail.co.uk/femail/article-13339871/Baby-Reindeer->
10 fans-float-theory-Richard-Gadds-stalker-Martha-Scott-man-real-life-
11 point-clues-hit-Netflix-series.html, last accessed July 28, 2024);
12 18. **Exhibit R:** the article titled “Richard Gadd asks fans to stop hunting
13 real-life ‘Baby Reindeer’ characters” (Vollmer, Bernelee; *Sunday*
14 *Tribune*, May 16, 2024; https://www.iol.co.za/sunday-tribune/entertainment/richard-gadd-asks-fans-to-stop-hunting-real-life-baby-reindeer-characters-8448358f-553e-48fd-9297-17ae9f9a5294#google_vignette, last accessed July 23, 2024);
15 19. **Exhibit S:** the article titled “Baby Reindeer: Has Richard Gadd's real
16 stalker been revealed?” (Phillipson, Daisy; *Dexerto*, May 1, 2024;
17 <https://www.dexerto.com/tv-movies/baby-reindeer-has-richard-gadd-real-stalker-revealed-2655346/>, last accessed July 23, 2024);
18 20. **Exhibit T:** the article titled “Labour inquiry follows selection
19 meeting” (*The Herald*, September 5, 2000;
20 <https://www.heraldscotland.com/news/12163265.labour-inquiry-follows-selection-meeting/>, last accessed July 23, 2024).

21 The Court takes notice of the aforementioned exhibits on the grounds that
22 their existence and contents are not subject to reasonable dispute. *See Whitaker v.*
23 *Fortuna Enterprises, L.P.*, 2021 WL 4260606, at *2 n.2 (C.D. Cal. May 21, 2021);

1 *Threshold Enterprises LTD. V. Pressed Juicery, Inc.*, 445 F.Supp.3d 139, 146
2 (N.D. Cal. 2020); *In re Bofl Holding, Inc. Secs. Litig.*, 2018 WL 1410729, at *7 n.5
3 (S.D. Cal. Mar. 21, 2018); *In re Am. Apparel, Inc. v. Shareholder Litig.*, 855 F.
4 Supp. 2d 1043, 1060-62 (C.D. Cal. 2012).

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7 **IT IS SO ORDERED.**

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9 Dated: _____, 2024

Hon. R. Gary Klausner
United States District Judge

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